

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

**Lead Case:** 1:19-cv-977-ADA

*(Consolidated with Nos. 6:19-cv-254-  
ADA, 6:19-cv-255-ADA, 6:19-cv-256-  
ADA)*

**SECOND JOINT MOTION TO AMEND AGREED SCHEDULING ORDER**

Plaintiff VLSI Technology LLC (“VLSI”) and Defendant Intel Corporation (“Intel”) (collectively the “parties”) file this Second Joint Motion to Amend Agreed Scheduling Order and show:

1. The First Amended Scheduling Order (Dkt No. 115) entered by the Court in the above-referenced actions set May 22, 2020 as the close of fact discovery and October 5, 2020 as the Anticipated Start of Jury Selection/Trial(s), among other dates. For good cause shown below, the parties seek to extend the close of fact discovery and all subsequent dates such that the close of fact discovery occurs on July 17, 2020 and the Anticipated Start of Jury Selection/Trial(s) occurs on November 16, 2020.

2. As a result of public-health orders issued in response to COVID-19, the parties’ ability to access Intel’s production of source code and other material requiring in-person review in Los Angeles pursuant the Agreed Protective Order (Dkt. No. 75) was interrupted on

approximately March 20, 2020, and continues to be on hold today. Intel expects that source code will once again be available for review by the parties' outside counsel, consultants, and experts on or about May 15, 2020.

3. To accommodate the anticipated approximately two-month interruption in access to those materials, and with the expectation that the source code and other material will again be adequately available on or about May 15, 2020, the parties have agreed to an adjustment of the case schedule as reflected in the attached proposed Second Amended Agreed Scheduling Order.

PREMISES CONSIDERED, VLSI and Intel request the Court to grant this Second Joint Motion to Amend Agreed Scheduling Order and to enter the attached proposed Second Amended Agreed Scheduling Order in the form submitted herewith, and for such other and further relief as the Court deems suitable and just.

Dated: May 12, 2020

Respectfully submitted,

/s/ Andy Tindel

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on May 12, 2020.

/s/ Andy Tindel  
Andy Tindel